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*Counsel for Defendant Hacienda Rooming House, Inc.
dba Bella's Hacienda Ranch*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA (RENO)

JANE DOE;

Plaintiff,

v.

**JOSEPH LOMBARDO, Governor of
Nevada, in his official capacity; AARON
FORD, Attorney General of Nevada, in his
official capacity; NYE COUNTY; ELKO
COUNTY; STOREY COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
WESTERN BEST, LLC; DESERT ROSE
CLUB, LLC; HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S HACIENDA
RANCH; MUSTANG RANCH
PRODUCTIONS, LLC d/b/a MUSTANG
RANCH LOUNGE, LLC; LEONARD
"LANCE" GILMAN, in his
official capacity; and LEONARD "LANCE"
GILMAN, in his individual capacity,**

Defendants.

Case No. 3:24-cv-00065-MMD-CSD

**DEFENDANT HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S
HACIENDA RANCH'S MOTION FOR
SANCTIONS**

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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Hacienda Rooming House, Inc. d/b/a Bella's Hacienda Ranch ("Bellas") hereby moves, pursuant to 28 U.S.C. §1927, FRCP 11, and the Court's inherent authority, for sanctions in connection with the dismissal of this matter on the grounds that this lawsuit is a part of a series of frivolous and bad faith attempts to destroy Nevada's legal prostitution industry by imposing unnecessary, coercive, and economically crippling litigation ("lawfare") on its lawful brothels. There is not a shred of truth to any of Jane Doe's material allegations in this matter. For brevity, Bellas hereby incorporates by reference the factual and legal predicate presented by co-Defendant Mustang Ranch Production, LLC in its Motion for Sanctions [#173]. Bellas, a small business located in rural north eastern Nevada, has been forced to incur \$18,720.00 to defend itself against this frivolous matter and requests that the sanctions be assessed against Jane Doe, and her counsel, jointly and severally, for reimbursement of the same. Sanctions are imperative here to dissuade them from continuing this pattern of vexatious litigation in the future.

DATED: May 6, 2025

STEPHENSON LAW, PLLC

/s/ John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*

DECLARATION

I, John Neil Stephenson, Esq. hereby swear, under penalty of perjury, that the matters set forth in this Declaration are true and accurate to the best of my knowledge and belief:

1. I am a trial and appellate attorney, licensed to practice in Nevada (SBN 12497) and California (SBN 251685); am in good standing; and have been practicing for approximately (17) seventeen years. I am the managing member of my own boutique law practice, Stephenson Law, PLLC, which focuses on low volume, high-stakes, civil and criminal litigation and also serves as general counsel for a number of companies, including the largest real estate developer in Hawaii and medical device startup. Prior to starting my own practice, I worked for large, national, firms in San Francisco and Las Vegas, focusing primarily on insurance defense/coverage and business litigation.

2. My judicial experience includes a clerkship with Chief Justice Mark Gibbons at the Nevada Supreme Court, an externship with Judge Arthur Alarcon at the Ninth Circuit Court of Appeals, and an externship with Judge Theodore Albert at the United States Bankruptcy Court for the Central District of California. I hold a bachelors of arts in economics from the University of California at Santa Cruz and a law degree from Southwestern where I served as an editor on its law review. I've also attended Beijing Foreign Studies University and the University of Glasgow, Scotland. I'm fascinated with politics and have taught political science as an adjunct professor at Great Basin Community College in Elko. I am also a yoga instructor (twice certified), a samurai (certified by a 16th generation master from Japan), and a professional dj.

1 3. In the 17 years that I have been practicing law, I have never been sanctioned,
2 disciplined, or sued for malpractice. I have no criminal history and particularly have never been
3 convicted of a felony or a crime involving dishonesty.

4 4. I submit this Declaration in support of the motion for sanctions brought by my
5 client, Bella's. To date, I have spent 28.8 hours on this matter at an hourly rate of \$650.00 for a
6 total of \$18,720.00. My hourly rate is fair and reasonable in light of my experience and training
7 as well as customary for a case of this size and complexity, particularly considering the outcome
8 (dismissal for failure for refusing to comply with the Court's order that Jane Doe disclose her
9 identity).
10

11 **FURTHER DECLARANT SAYETH NOT**
12

13 DATED: May 6, 2025
14 In Reno, Nevada

STEPHENSON LAW, PLLC

/s/ John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing, DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH'S MOTION FOR SANCTIONS by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: May 6, 2025

STEPHENSON LAW, PLLC

/s/ John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*